



Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

January 13, 2004

Dan J. Alpert, Esq.
Counsel for Georgia-Carolina Radiocasting Company, LLC
The Office of Dan J. Alpert
2120 N. 21st Rd.
Arlington, Virginia 22201

In re: RM-11126

Dear Mr. Alpert:

This letter references the petition for rule making filed on behalf of Georgia-Carolina Radiocasting Company, LLC, ("Petitioner"), licensee of FM Station WEHR, Channel 286A, Elberton, Georgia. The Petitioner filed its petition requesting an incompatible channel swap for FM Station WEHR pursuant to Section 1.420(g)(3) of the Commission's rules.

Petitioner originally filed its proposal requesting the substitution of Channel 249C2 for Channel 286A at Elberton, Georgia and modification of the FM Station WEHR license accordingly. To accommodate the proposed Elberton channel substitution, Petitioner requested that Station WMGZ, Channel 249C3, Eatonton, Georgia involuntary change its channel to Channel 286C3 at Eatonton, Georgia and modify its license to reflect the change.¹ To this end, Petitioner proposed an incompatible channel swap with Station WMGZ pursuant to Section 1.420(g)(3) of the Commission's rules.² The proposal also requested the reclassification of FM Station WHZT, Channel 251C, Seneca, South Carolina to specify operation as a C0 facility pursuant to the Commission's Class C0 procedures because FM Station WHZT was operating below minimum Class C facilities and would be short-spaced to the Channel 249C2 Elberton allotment.³

¹ The foregoing petition conflicts with MB Docket No. 04-379. This petition was filed prior to the issuance of the *Notice of Proposed Rule Making* in MB Docket No. 04-379. The proceeding set forth a proposal filed by Middle Georgia Communications, Inc., licensee of Station WMGZ(FM) requesting the substitution of Channel 249C2 for Channel 249C3 at Eatonton, Georgia, reallocation of Channel 249C2 from Eatonton to Lexington, Georgia and modification of the Station WMGZ(FM) license accordingly. See *Eatonton and Lexington, Georgia*, 19 FCC Rcd 18738 (MB 2004).

² See also *Amendment of the Commission's Rules Regarding Modification of FM Broadcast Licenses to Higher Class Co-Channel or Adjacent Channels*, 60 RR 2d 114 (1986).

³ See 1998 Biennial Regulatory Review—Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules, 15 FCC Rcd 21,649 (2000) ("Second Report and Order"), and 47 C.F.R. §§ 1.420(g), n. 2, and 73.3573, n. 4.

In response to a staff letter, CXR Holdings, Inc., licensee of Station WHZT filed a statement expressing its intention to seek authority to modify the facilities of Station WHZT to attain minimum Class C antenna height above average terrain.⁴ Thereafter, CXR Holdings, Inc. filed a minor change application specifying minimum Class C antenna height for Station WHZT.⁵ As a result of the filing of this application, Petitioner modified its original by the requesting the substitution of Channel 286C2 for Channel 286A at Elberton, Georgia, reallocation of Channel 286C2 from Elberton to Union Point, Georgia, and modification of the FM Station WEHR license accordingly. CXR Holdings, Inc. later filed an amendment to its application requesting to specify operation on Channel 251C1 in lieu of Channel 251C at Seneca, South Carolina. Thereafter, Petitioner again amended its proposal.

The amended proposal requested the substitution of Channel 249C2 for Channel 286A at Elberton, Georgia, reallocation of Channel 249C2 from Elberton, Georgia to Calhoun Falls, South Carolina, as its first local service, and modification of the FM Station WEHR license accordingly at coordinates 33-54-36 NL and 82-44-57 WL. To accommodate the Calhoun Falls reallocation, the amended proposal requested an involuntary channel substitution for Station WMGZ(FM), Channel 249C3, Eatonton, Georgia to specify operation on Channel 286C3 at Eatonton, Georgia and modification of its license to reflect this change.⁶

The petition as amended is unacceptable for consideration at this time. Specifically, the amended proposal requests a change of community of license of Station WEHR to specify operation on Channel 249C2 at Calhoun Falls, South Carolina. In this instance, the proposed reallocation of Channel 249C2 to Calhoun Falls, South Carolina is not mutually exclusive with Station WEHR's existing Channel 286A at Elberton, Georgia. Section 1.420(i) of the Commission's rules permits a station to modify its license to specify a new community of license in circumstances where the amended allotment would be mutually exclusive with the existing allotment and prohibits a station from upgrading on a non-adjacent channel at a new community.⁷ In this regard, an FM licensee is only permitted to change its community of license specifying an adjacent or co-channel at the new community.

⁴ See *Letter to Kevin F. Reed, Esq., Station WHZT(FM), Seneca, SC*, File No. BLH-19980629KB (September 16, 2003).

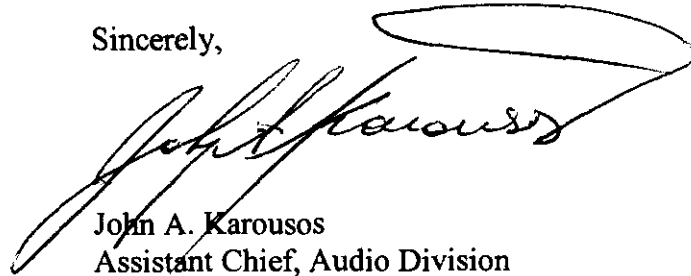
⁵ See BPH-20040413ABO.

⁶ The amended proposal also requested the reclassification of FM Station WHZT, Channel 251C, Seneca, South Carolina to specify operation as a C0 facility to facilitate the Calhoun Falls reallocation. On August 31, 2004, FM Station WHZT was granted a construction permit to specify operation on Channel 251C1 at Seneca, South Carolina. See BPH-20040413ABO. Moreover, the license for FM Station WHZT was reclassified to specify operation as a Class C0 facility on September 7, 2004 pursuant to the Section 73.3573, n. 4 of the Commission's rules. See BLH-19980629KB. In this regards, the FM Table of Allotment does not reflect Channel 251C0 at Seneca, South Carolina.

⁷ See *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989).

Based on the foregoing, we are returning your petition for rule making. You may re-file your petition, provided it meets the requirements of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Karousos". The signature is written in a cursive style with a large, sweeping loop at the end.

John A. Karousos
Assistant Chief, Audio Division
Media Bureau

Enclosures

cc: Lauren A. Colby, Esq., Counsel for Middle Georgia Communications, Inc.

Before the
Federal Communications Commission
Washington, DC 20554

RECEIVED

JUL 22 2004

Federal Communications Commission
Office of Secretary

In the Matter of:

originally:

Amendment of Section 73.202(b),)	
Table of Allotments,)	RM-
FM Broadcast Stations)	
(Elberton and Eatonton, Georgia;)	
Seneca, South Carolina))	

as amended previously to:

Amendment of Section 73.202(b),)	
Table of Allotments,)	RM-
FM Broadcast Stations)	
(Elberton and Union Point, Georgia))	

currently proposed:

Amendment of Section 73.202(b),)	
Table of Allotments,)	RM-
FM Broadcast Stations)	
(Elberton and Eatonton, Georgia;)	
Calhoun Falls and Seneca, South Carolina))	

Filed With: **Office of the Secretary**

Directed To: **Assistant Division Chief, Audio Division**
Mass Media Bureau

AMENDMENT TO PETITION FOR RULEMAKING AND FOR
ISSUANCE OF ORDER TO SHOW CAUSE

Georgia-Carolina Radiocasting Company, LLC ("GCR"), by its attorney, hereby amends the "Petition for Rulemaking and for Issuance of Order to Show Cause" filed on July 16, 2003 to, and amended on March 11, 2004, to amend the FM Table of Allotments in lieu of its original request, as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Elberton, GA WEHR	286A	--
Calhoun Falls, GA	--	249C2
Eatonton, GA WMGZ	249C3	286C3
Seneca, SC	251C	251C0

In support thereof, the following is stated:

GCR is licensee of Station WEHR(FM), Elberton, Georgia. GCR desires to upgrade its station to a Class C2 facility to enable it to improve and increase its area-wide coverage. As seen in the attached Technical Comments, this objective can be accomplished by allowing WEHR(FM) to swap channels with Station WMGZ(FM), Channel 249C3, Eatonton, Georgia, namely by deleting Channel 286A at Elberton and instead allotting Channel 286C3 to Eatonton; and deleting Channel 249C3 at Eatonton and instead allotting Channel 249C2 to Elberton; and then changing the city of license of Channel 249C2 from Eatonton, Georgia, to Calhoun Falls, South Carolina. Channel 249C2 is not available for use at Calhoun Falls. In order to accommodate the proposed allotment of Channel 249C2 to Calhoun Falls, GCR further proposes to downgrade the channel of operation of Station WHZT(FM), Seneca, South Carolina, from Channel 251C to Channel 251C0.

Although this swap involves non-adjacent channels, it is not appropriate under the Commission's rules for the Commission to subject proposed Channel 249C2 at Calhoun Falls to "competing expressions of interest" or for the proposed channel to be opened up to the public for competing applications. Under Section 1.420(g)(3) of the Commission's rules, licensees may request the substitution of a higher class of channel

and a modification of their existing licenses in the course of a rulemaking proceeding if they are upgrading on their existing channels or on channels that are adjacent to their current channels of operation. 47 C.F.R. § 1.420(g)(3). Admittedly, this case does not involve that situation. In adopting this rule, however, the Commission *also* stated:

we are asked to consider variations of the rule which involve the need to make substitutions at other communities in order to create a mutually exclusive relationship. The scenario is as follows: a Class A licensee operating on Channel 240A files a request to upgrade on Channel 271C2 and proposed to exchange channels with a licensee in another community currently operating on Channel 270A. It is argued that although Channels 240A and 271C2 are not adjacent, nevertheless Channel 271C2 is not available in the Ashbacker sense for application by other interested parties, because Channel 270A must be replaced with Channel 240A in order for the upgrade to be possible. Only the licensee on Channel 240A could utilize Channel 271C2 in this scenario. We recognize that this sequence of events is not strictly an adjacent channel relationship. However, the mutually exclusive relationship of the channels involved is similar to the subject proposal. We believe that rather than foreclose this type of proposal, we shall analyze such requests on a case-by case basis to ascertain the exact factual situation and determine whether the rationale used here for the new rule...applies. The concern in all such cases would be mutually exclusive relationship which is created.

Amendment of the Commission's Rules Regarding Modification of FM Broadcast

Licenses to Higher Class Co-channel or Adjacent Channels, 60 R.R.2d 114, 120 ¶ 24

(1986). Since the adoption of that *Report and Order*, the Commission has accepted and adopted proposals for "incompatible channel swaps" that include the required "mutual exclusivity" between the proposed swapping channels detailed above. See, e.g., *Jackson and Salyersville, KY*, 17 FCC Rcd 4462 (Chief, Allocations Branch 2002); *Pikeville, KY, Clinchco, VA and Matewan, WV*, 6 FCC Rcd 3732 (Chief, Allocations Branch 1991); *Angola, Berne, Decatur, Lagrange, and Roanoke, IN*; *Brooklyn and Hudson, MI*, 6 FCC Rcd 1230 (Acting Chief, Allocations Branch 1991); *Beverly Hills, Chiefland,*

Holiday, Micanopy and Saratoga, FL, 8 FCC Rcd 2197 (Chief, Allocations Branch 1993). See also, *Cordova, Holly Pond, and Warrior, AL*, 5 FCC Rcd 6301 (Deputy Chief, Policy and Rules Div. 1990).

As seen in the attached Technical Comments, in the present case, the required "mutual exclusivity" between the two channels and communities clearly exists; and further, as required, Channel 249C2 is the only Class C2 channel available for use at Calhoun Falls, and Channel 286C3 is the only other Class C3 channel available for use at Eatonton. See *Dyersburg, TN; De Witt, Heber Springs, Hoxie, Jonesboro, and Newport, AR*, 4 FCC Rcd 4814, 4816 ¶ 16 (Chief, Allocations Branch 1989).

Thus, it is requested that it be determined that the parties have proposed a valid "incompatible channel swap" within the meaning of the Commission's *Report and Order*, that the proposal be accepted and placed on public notice in a *Notice of Proposed Rulemaking* for comment, and that the Commission specifically state that no competing expressions of interest for the upgraded channel may be filed by the public.

With respect to the proposed downgrade of Station WHZT(FM), Seneca, South Carolina, the current Station WHZT(FM) license specifies an operation of 100 kW at 304 meters HAAT, which is below the minimum Class C antenna height requirements of 451 meters HAAT. 47 C.F.R. § 73.211(a)(2). Section 316(a) of the Communications Act, as amended, permits the Commission to modify an authorization if such action is in the public interest. Because Station WHZT(FM) is operating below minimum Class C standards, it properly is subject to reclassification as a "Class C0" facility. See 1998 *Biennial Regulatory Review — Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules*, 15 FCC Rcd 21,649 (2000) ("Second Report and Order"),

and Section 1.420(g), n.2, and Section 73.3573, n.4 (47 C.F.R. §§ 1.420(g), n.2 and 73.3573 n.2), of the Commission's Rules. Pursuant to the Commission's rules, the reclassification of a Class C FM station to a Class C0 station may be initiated through the filing of a petition for rule making to amend the FM Table of Allotments. In instances where an initiating petition proposes both to amend the FM Table of Allotments and to reclassify a Class C FM station, the Commission will issue an order to show cause, as set forth in Section 73.3573, note 4, of the Commission's rules. A petitioner proposing both amendment of the FM Table of Allotments and reclassification of a Class C FM station must certify that no alternative channel is available for the proposed service.

Reclassification of License of Station KMMZ-FM, Enid, OK, DA 03-1121 (Ass't Chief, Audio Div., May 9, 2003). As seen in the attached Technical Comments, that certification can accurately be made in this case – no Class C2 channel other than Channel 249C2 is available for service at Calhoun Falls. Therefore, issuance of an “Order to Show Cause” requiring the licensee of WHZT to show cause why its authorization should not be modified to specify operation on Channel 251C0 in lieu of Channel 251C is appropriate.

It should be noted that a procedure for the downgrade of Station WHZT already is in process due to the filing of a non-rulemaking “triggering” application by Station WKXJ(FM), Signal Mountain, Tennessee (File No. BPH-20030609ADA). As seen in Attachment 2, on September 16, 2003, the Media Bureau sent out a show cause letter requiring CXR Holdings, Inc., the licensee of Station WHZT(FM), to show cause why Station WHZT(FM) should not be downgraded to Class Co. CXR responded, stating that it would file an application within the requisite 180 period to attain minimum Class

C antenna height above average terrain. Attachment 3. Although CXR initially filed such an application on April 13, 2004 (the last day for filing such an application), on June 15, 2004, that application was amended to instead specify Class C1 facilities. Having defaulted in its opportunity to file and prosecute an application to upgrade to full Class C facilities, WHZT should be downgraded immediately. In the unlikely event it still remains necessary, issuance of a new Order to Show Cause respectfully is requested.

Adoption of this proposal will be in the public interest. Approval of this proposal will allow GCR to improve the service that it provides to the public by greatly increasing the service area and overall population served by Station WEHR(FM). GCR pledges expeditiously to apply for and to construct this proposed facility when this counterproposal is granted by the Commission. Moreover, the proposed change of channel of operation for Station WMGZ from Channel 249C3 to Channel 286C3 will occur at the licensee's current transmitter site, and thus, will not result in any reduction of service to the public. As required, GCR pledges to reimburse the licensee of WMGZ for all reasonable expenses incurred in connection with the change of frequency of operation. With respect to Station WHZT, there also will be no actual reduction of service to the public. Although under GCR's proposal WHZT's allotment will be downgraded from Class C to Class C0, WHZT's licensed parameters will not change, and WHZT will continue to be permitted to provide the same level of service it currently is providing to the public.

Accordingly, Georgia-Carolina Radiocasting, LLC respectfully requests that this Petition be adopted; that the Commission issue an "Order to Show Cause" with respect

to the licensee of Station WHZT with respect to the proposed downgrade of Station WHZT; and subsequently, that the Commission issue a Notice of Proposed Rulemaking to amend the FM Table of Allotments as specified above, and accept comments thereon.

Respectfully submitted,

**GEORGIA-CAROLINA
RADIOCASTING COMPANY, LLC**

By: _____


Dan J. Alpert

Its Attorney

*The Office of Dan J. Alpert
2120 N. 21st Rd.
Arlington, VA 22201*

703-243-8690

July 22, 2004

Attachment 1

Charles M. Anderson and Associates

Broadcast Allocation Consultants
1519 Euclid Avenue
Bowling Green, KY 42103

Phone 270-782-0246
Fax 270-793-9129
Cell 270-535-4432

TECHNICAL REPORT

This **Technical Report** has been developed in support of a proposed rulemaking requesting the reallocation of WEHR on 286A from Elberton, GA to Calhoun Falls, SC on channel 249C2 as a first local service through an incompatible swap with station WMGZ's licensed facility on 249C3 at Eatonton, GA. The proposed changes are entirely mutually exclusive with existing licensed facilities for both stations (see E1 and E1A), and in each case is the only channel available for use (see preclusion studies E5A and E5B). Consequently, the instant proposal fully qualifies as an *incompatible swap*. Elberton, GA will continue to be served by fulltime AM station WSGC(AM) on 1400 kHz/ 1 kw-Unlimited. It is also currently served by WSGC-FM on channel 221A for which there is a pending move to Lavonia, GA.

I. Summary of Proposed Allocations Changes:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>	<u>Coordinates</u>
Calhoun Falls, SC	-----	249C2	N 33-54-36 W 82-44-57 24.7 km southwest
Elberton, GA	286A	-----	
Eatonton, GA	249C3	286C3	N 33-20-41 W 83-13-41 (Licensed WMGZ site)
Seneca, SC	251C	251C0	N31-41-15 W82-59-13 (WHZT licensed site)

Charles M. Anderson and Associates

Broadcast Allocation Consultants
1519 Euclid Avenue
Bowling Green, KY 42103

Phone 270-782-0246
Fax 270-793-9129
Cell 270-535-4432

II. Population and area gain for proposed reallocations:

The proposed reallocation of WEHR to Calhoun Falls, SC at the proposed reference coordinates will serve a population of 139,991 within the 60 dBu contour. This represents a gain of 110,233 in population (+370.4%) and a gain of 6,071 sq km in service area (+241.3%) when compared to the licensed WEHR 286A facility using uniform maximum class 60 dBu contours (see E4). Exhibit E4 also demonstrates that there will be no loss area.

III. Allocation Analyses:

Exhibits E1, E2 and E3 demonstrates that the proposed reallocation of WEHR to Calhoun Falls on 249C2 will meet Section 73.207 spacing requirements and Section 73.315 requirements for 70 dBu service over the community and line of sight from the reference point to the community. A declass of WHZT at Seneca, SC on 251C to 251C0 is proposed herein. It is noted that station WHZT has amended its pending application to specify 251C1 (BPH-20040413ABO). The instant proposal is also fully spaced to that application.

Exhibit E1B demonstrates that the proposed substitution of 286C3 for 249C3 at the WMGZ licensed site will meet Section 73.207 spacing requirements.

Preclusion studies are provided as exhibits E5A and E5B clearly showing that there are no other channels available for use at Calhoun Falls or for substitution at Eatonton's WMGZ licensed site fully meeting the requirements for an incompatible swap.

Charles M. Anderson and Associates

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All allocation studies were conducted utilizing V-Soft's FMCONT and PROBE
III software, the VSOF 30 second terrain database and 2000 US CENSUS data.

IV. Conclusion:

It is concluded that the proposed incompatible swap meets all applicable
Commission rules and policies, and will result in an increase of population served of
110,233 (+370.4%) and area served of 6,071 square km (+241.3%) while providing a first
local aural service to the community of Calhoun Falls, SC.



Charles M. Anderson July 20, 2004

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E1 CALHOUN FALLS ALLOCATION STUDY

REFERENCE
33 54 36 N
82 44 57 W

CLASS = C2
Current Spacings

DISPLAY DATES
DATA 07-20-04
SEARCH 07-20-04

----- channel 249 - 97.7 MHz -----

Call	channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 249C2	Lincolnton	GA 16.14	165.9	189.5	-173.36
(Calhoun Falls conflicts with this proposal)						
WMGZ	LIC 249C3	Eatonton	GA 76.84	215.3	176.5	-99.66
(Incompatible swap with WMGZ proposed herein)						
RDEL	DEL 249C3	Eatonton	GA 76.84	215.3	176.5	-99.66
WHZT.A	APP-Z 251C	Seneca	SC 75.89	343.8	104.5	-28.61
(This application has been amended to 251C1 - BPH-20040413ABO and no longer requires protection)						
RDEL	DEL 251C	Seneca	SC 88.97	345.9	104.5	-15.53
WHZT	LIC 251C0	Seneca	SC 88.97	345.9	88.5	+.47
(Declass of the licensed 251C facility to 251C0 is proposed herein)						
WFOX	LIC 246C	Gainesville	GA 105.25	283.5	104.5	0.75
WCOSFM	LIC 248C1	Columbia	SC 158.43	80.2	157.5	0.93
WHZT.A	APP-Z 251C1	Seneca	SC 88.83	8.5	78.5	10.33
WTCQ	LIC 249A	Vidalia	GA 189.70	171.1	165.5	24.20
WIIZ	LIC 250C2	Blackville	SC 154.28	124.6	129.5	24.78
WPEG	LIC-D 250C	Concord	NC 217.51	41.6	187.5	30.01
WSLT	LIC 252A	Clearwater	SC 94.78	121.0	54.5	40.28
WKCX	LIC-Z 249C3	Rome	GA 231.81	279.7	176.5	55.31
WIBBFM	LIC 250C3	Fort Valley	GA 175.82	212.5	116.5	59.32
WPZE	LIC 248C3	Fayetteville	GA 176.26	255.2	116.5	59.76
WJXBFM	LIC 248C	Knoxville	TN 256.81	335.5	187.5	69.31
WUFFFFM	LIC 248A	Eastman	GA 191.81	193.3	105.5	86.31
WUFFFFM	APP 248A	Eastman	GA 192.28	193.2	105.5	86.78
AL251	RSV 251C3	East Dublin	GA 150.03	178.3	55.5	94.53
WELT.C	CP 251C3	East Dublin	GA 151.28	176.4	55.5	95.78
WELT	LIC 251A	Swainsboro	GA 151.26	166.1	54.5	96.76
WKA	LIC-N 249A	Ocala	GA 269.80	191.8	165.5	104.30

E1A WMGZ 286C3 INCOMPATIBLE SWAP

REFERENCE
33 20 41 N
83 13 41 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 07-20-04
SEARCH 07-20-04

----- Channel 286 - 105.1 MHz -----									
Call	Channel	Location		Dist	Azi	FCC	Margin		
RADD	ADD 286C2	Union Point	GA	21.14	79.7	176.5	-155.36*		
RADD	ADD 286C3	Eatonton	GA	0.69	90.0	152.5	-151.81*		
RDEL	DEL 286A	Elberton	GA	83.03	30.3	141.5	-58.47*		
WEHR	LIC 286A	Elberton	GA	83.03	30.3	141.5	-58.47*		
WEHR.A	APP-Z 286A	Elberton	GA	97.24	27.7	141.5	-44.26*		
WEHR.A	APP-Z 286A	Elberton	GA	97.24	27.7	141.5	-44.26*		
WFSHFM	LIC 284C1	Athens	GA	80.11	316.4	75.5	4.61		
WFSHFM	CP 284C1	Athens	GA	80.42	316.4	75.5	4.92		
WMAXFM	LIC-N 287C1	Bowdon	GA	149.25	273.3	143.5	5.75		
WMC.G.C	CP -Z 285C2	Milan	GA	127.09	182.8	116.5	10.59		
WAYS	LIC-Z 288C3	Macon	GA	57.34	209.9	42.5	14.84		
WMC.G	LIC 285C2	Milan	GA	135.74	181.6	116.5	19.24		
WHEL.C	CP 286A	Helen	GA	162.43	343.7	141.5	20.93		
WHEL	LIC-Z 286A	Helen	GA	162.43	343.7	141.5	20.93		
AL287	VAC 287C3	Alamo	GA	122.60	157.3	98.5	24.10		
WZNY	LIC-N 289C	Augusta	GA	129.56	85.9	95.5	34.06		
960916	VAC 232A	Gibson	GA	58.23	98.2	11.5	46.73		
960916	CP -N 232A	Gibson	GA	59.85	99.3	11.5	48.35		

* substitution of WEHR's 286A as 286C3 for WMGZ's 249C3 is proposed as an incompatible swap.

33 54 32
82 45 7

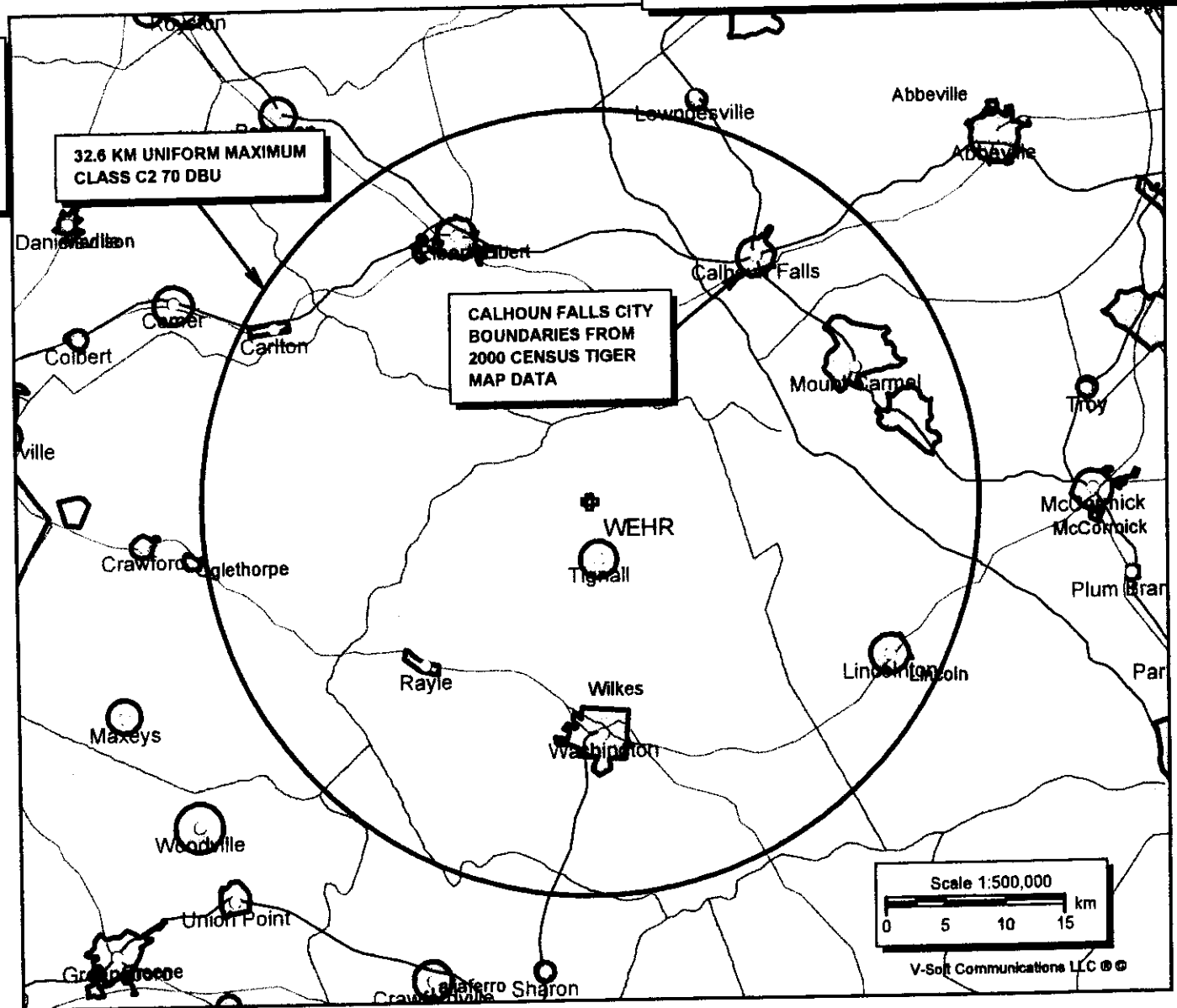
CHARLES M. ANDERSON AND ASSOCIATES

**E-2 CALHOUN FALLS
70 DBU COVERAGE**

Latitude: 33-54-36 N
Longitude: 082-44-57 W

**32.6 KM UNIFORM MAXIMUM
CLASS C2 70 DBU**

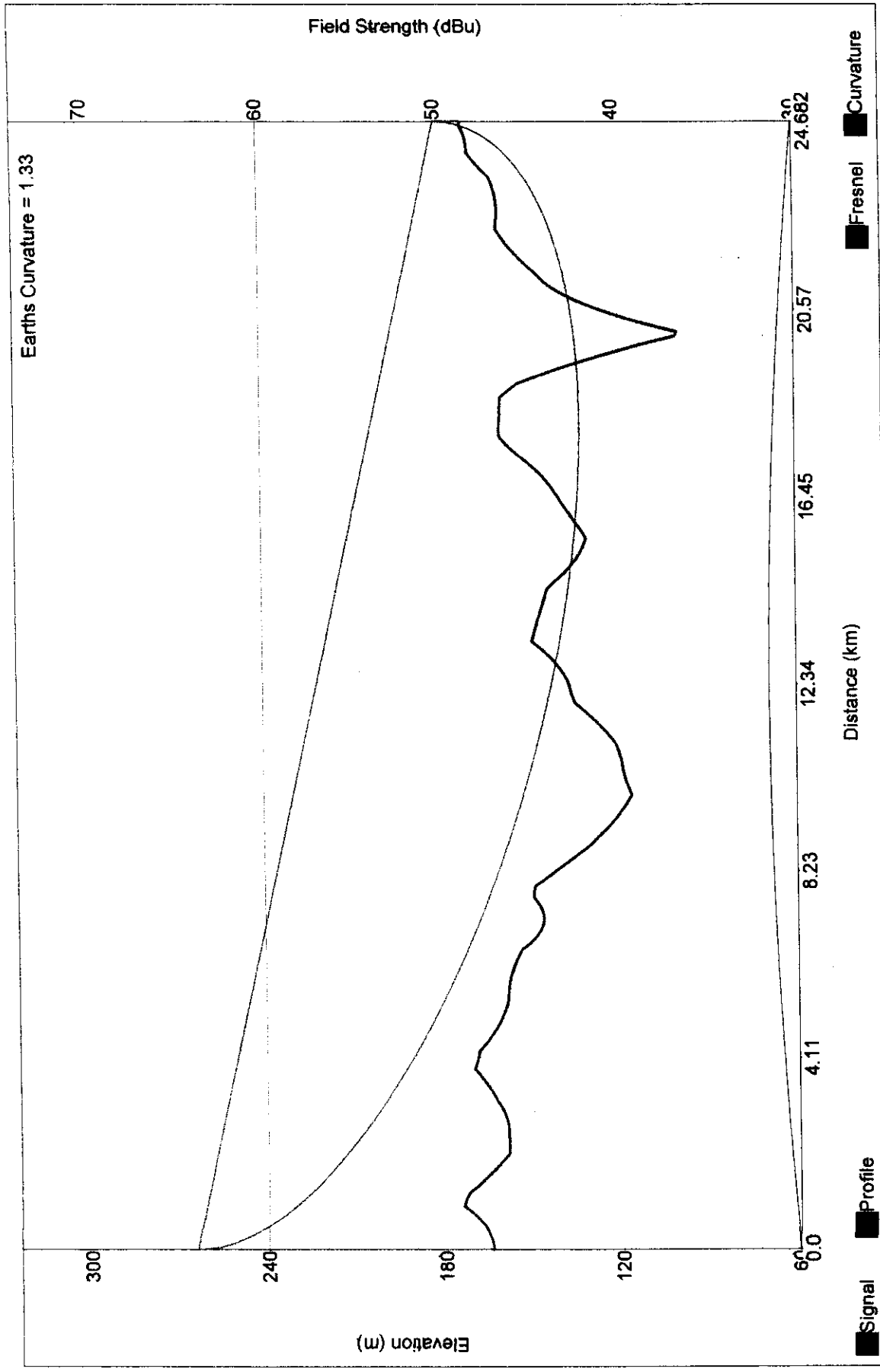
**CALHOUN FALLS CITY
BOUNDARIES FROM
2000 CENSUS TIGER
MAP DATA**



Scale 1:500,000
0 5 10 15 km

V-Soft Communications LLC ©

E-3 LINE OF SIGHT



Starting Latitude: 33-54-36 N

End Latitude: 34-05-32 N

Distance: 24.681801373 km

Starting Longitude: 082-44-57 W

End Longitude: 082-35-45 W

Bearing: 34.982 deg

Transmitter Height (AG) = 100.0 m

Transmitter Elevation = 164.0 m

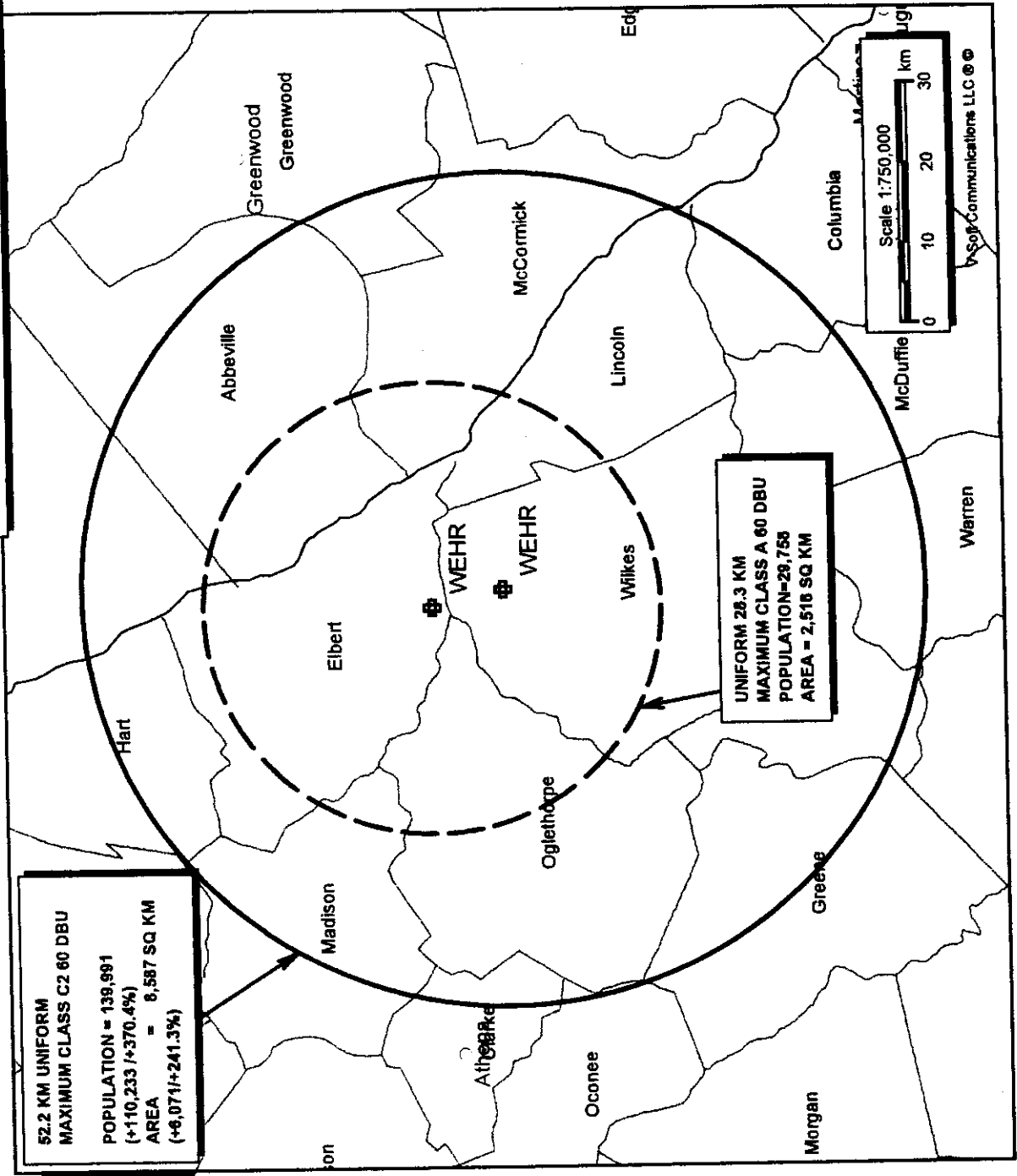
Frequency = 97.7 MHz

Receiver Height (AG) = 9.1 m

Receiver Elevation = 170.8 m

Fresnel Zone: 0.6

CHARLES M. ANDERSON AND ASSOCIATES



E5A CALHOUN FALLS 249C2 PRECLUSION STUDY

REFERENCE		DISPLAY DATES
33 54 36 N	Class C2 Preclusions	DATA 07-20-04
82 44 57 W	Current Spacings	SEARCH 07-20-04

Call	Channel	Location	Dist	Azi	FCC	Margin
------	---------	----------	------	-----	-----	--------

--- Channel 221 92.1 MHz. ---

WSGCFM	LIC	221A	Elberton	GA	20.66	309.9	165.5	-144.84
AL221	VAC	221A	Lavonia	GA	75.75	323.5	165.5	-89.75
WJESFM	LIC	221A	Saluda	SC	90.50	80.0	165.5	-75.00
WJESFM	CP	221A	Saluda	SC	101.24	81.5	165.5	-64.26
WPEHFM	LIC	221A	Louisville	GA	104.83	161.5	165.5	-60.67
WAEG	LIC	222A	Evans	GA	59.67	126.4	105.5	-45.83
AL221	RSV	221C3	Irmo	SC	144.01	78.9	176.5	-32.49
WJGAFM	LIC	221A	Jackson	GA	133.02	238.4	165.5	-32.48
WMOQ	LIC	222A	Bostwick	GA	76.99	256.8	105.5	-28.51
WJESFM	APP-Z	221C3	Irmo	SC	151.11	82.3	176.5	-25.39
AP220	APP-N	220C3	Toombsboro	GA	100.02	202.7	116.5	-16.48
990630	APP	220A	Pendergrass	GA	89.60	292.6	105.5	-15.90
WUGA	LIC	219A	Athens	GA	45.97	271.6	54.5	-8.53
990514	APP	220A	Milledgeville	GA	102.32	205.1	105.5	-3.18

--- Channel 222 92.3 MHz. ---

WAEG	LIC	222A	Evans	GA	59.67	126.4	165.5	-105.83
WMOQ	LIC	222A	Bostwick	GA	76.99	256.8	165.5	-88.51
WSGCFM	LIC	221A	Elberton	GA	20.66	309.9	105.5	-84.84
WESCFM	LIC	223C	Greenville	SC	136.80	5.3	187.5	-50.70
AL221	VAC	221A	Lavonia	GA	75.75	323.5	105.5	-29.75
WJESFM	LIC	221A	Saluda	SC	90.50	80.0	105.5	-15.00
WMKS	LIC-N	222A	Macon	GA	150.71	213.4	165.5	-14.79
WUGA	LIC	219A	Athens	GA	45.97	271.6	54.5	-8.53
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	54.5	-4.69
WJESFM	CP	221A	Saluda	SC	101.24	81.5	105.5	-4.26
WPEHFM	LIC	221A	Louisville	GA	104.83	161.5	105.5	-0.67

--- Channel 223 92.5 MHz. ---

WESCFM	LIC	223C	Greenville	SC	136.80	5.3	248.5	-111.70
WAEG	LIC	222A	Evans	GA	59.67	126.4	105.5	-45.83
WSGCFM	LIC	221A	Elberton	GA	20.66	309.9	54.5	-33.84
WMOQ	LIC	222A	Bostwick	GA	76.99	256.8	105.5	-28.51
WKSXFM	LIC	224A	Johnston	SC	85.38	101.4	105.5	-20.12
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	54.5	-7.43
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	54.5	-4.69

--- Channel 224 92.7 MHz. ---

WKSXFM	LIC	224A	Johnston	SC	85.38	101.4	165.5	-80.12
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	105.5	-55.69
WESCFM	LIC	223C	Greenville	SC	136.80	5.3	187.5	-50.70
WKKZ	LIC	224C2	Dublin	GA	154.52	185.2	189.5	-34.98
WSGCFM	LIC	221A	Elberton	GA	20.66	309.9	54.5	-33.84
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	54.5	-7.43
WZGC	LIC	225C1	Atlanta	GA	152.67	264.1	157.5	-4.83

--- Channel 225 92.9 MHz. ---

WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	165.5	-115.69
WZGC	LIC	225C1	Atlanta	GA	152.67	264.1	223.5	-70.83
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	105.5	-58.43
AL225	VAC	225A	Waynesboro	GA	112.86	142.1	165.5	-52.64
WKSXFM	LIC	224A	Johnston	SC	85.38	101.4	105.5	-20.12

--- Channel 226 93.1 MHz. ---

WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	165.5	-118.43
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	105.5	-55.69
WZMJ	LIC	226A	Batesburg	SC	124.14	90.1	165.5	-41.36
WTPT	LIC	227C	Forest City	NC	158.31	17.2	187.5	-29.19
WZGC	LIC	225C1	Atlanta	GA	152.67	264.1	157.5	-4.83

--- Channel 227 93.3 MHz. ---

WTPT	LIC	227C	Forest City	NC	158.31	17.2	248.5	-90.19
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	105.5	-58.43
AL227	VAC	227A	Wadley	GA	120.08	164.5	165.5	-45.42
WVFJFM	APP	227C1	Manchester	GA	206.39	234.3	223.5	-17.11
WVFJFM	LIC	227C1	Manchester	GA	208.79	244.5	223.5	-14.71
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	54.5	-4.69

--- Channel 228 93.5 MHz. ---

WFBCFM	LIC	229C	Greenville	SC	133.97	5.5	187.5	-53.53
WTPT	LIC	227C	Forest City	NC	158.31	17.2	187.5	-29.19
WPEZ	LIC-N	229C1	Jeffersonville	GA	148.97	210.7	157.5	-8.53
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	54.5	-7.43
WARQ	LIC	228A	Columbia	SC	158.79	85.9	165.5	-6.71
WZLAFM	LIC-N	225A	Abbeville	SC	49.81	51.7	54.5	-4.69
WDOGFM	LIC	228A	Allendale	SC	164.37	126.5	165.5	-1.13

--- Channel 229 93.7 MHz. ---

WFBCFM	LIC	229C	Greenville	SC	133.97	5.5	248.5	-114.53
WPEZ	LIC-N	229C1	Jeffersonville	GA	148.97	210.7	223.5	-74.53
WGOR	LIC-Z	230C3	Martinez	GA	80.57	130.5	116.5	-35.93
WGACFM	LIC	226A	Warrenton	GA	47.07	165.2	54.5	-7.43

--- Channel 231 94.1 MHz. ---

RDEL	DEL	231C	Smyrna	GA	147.76	263.9	248.5	-100.74
WSTR	LIC	231C	Smyrna	GA	147.76	263.9	248.5	-100.74
RADD	ADD	231C0	Smyrna	GA	147.76	263.9	238.5	-90.74
WHZQ	LIC-Z	231A	Cross Hill	SC	84.05	66.8	165.5	-81.45
WGOR	LIC-Z	230C3	Martinez	GA	80.57	130.5	116.5	-35.93
960916	VAC	232A	Gibson	GA	72.34	169.7	105.5	-33.16
960916	CP -N	232A	Gibson	GA	73.93	168.8	105.5	-31.57
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	54.5	-7.66

--- Channel 232 94.3 MHz. ---

960916	VAC	232A	Gibson	GA	72.34	169.7	165.5	-93.16
960916	CP -N	232A	Gibson	GA	73.93	168.8	165.5	-91.57
WMUUFM	LIC	233C	Greenville	SC	118.54	15.0	187.5	-68.96
RDEL	DEL	231C	Smyrna	GA	147.76	263.9	187.5	-39.74
WSTR	LIC	231C	Smyrna	GA	147.76	263.9	187.5	-39.74
RADD	ADD	231C0	Smyrna	GA	147.76	263.9	175.5	-27.74
WHZQ	LIC-Z	231A	Cross Hill	SC	84.05	66.8	105.5	-21.45
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	54.5	-7.66
960911	APP-N	232A	Forest Acres	SC	158.79	85.9	165.5	-6.71
960911	CP -Z	232A	Forest Acres	SC	158.79	85.9	165.5	-6.71
WEHR	LIC	286A	Elberton	GA	9.08	346.0	14.5	-5.42
RDEL	DEL	286A	Elberton	GA	9.08	346.0	14.5	-5.42

--- Channel 233 94.5 MHz. ---

WMUUFM	LIC	233C	Greenville	SC	118.54	15.0	248.5	-129.96
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	105.5	-58.66
960916	VAC	232A	Gibson	GA	72.34	169.7	105.5	-33.16
960916	CP -N	232A	Gibson	GA	73.93	168.8	105.5	-31.57
WBYZ	LIC	233C	Baxley	GA	237.18	173.2	248.5	-11.32
RDEL	DEL	286A	Elberton	GA	9.08	346.0	14.5	-5.42
WEHR	LIC	286A	Elberton	GA	9.08	346.0	14.5	-5.42

--- Channel 234 94.7 MHz. ---

AL234	VAC	234A	Crawfordville	GA	46.84	203.1	165.5	-118.66
WMUUFM	LIC	233C	Greenville	SC	118.54	15.0	187.5	-68.96
WAAW	LIC	234A	Williston	SC	113.39	112.9	165.5	-52.11
WLTM	LIC	235C1	Atlanta	GA	147.73	266.0	157.5	-9.77
AL237	VAC	237A	Due West	SC	52.42	36.9	54.5	-2.08

--- Channel 235 94.9 MHz. ---

WLTM	LIC	235C1	Atlanta	GA	147.73	266.0	223.5	-75.77
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	105.5	-58.66
WCHZ	LIC-Z	236C3	Harlem	GA	69.23	132.9	116.5	-47.27
WHKN	LIC-N	235C3	Millen	GA	154.53	147.6	176.5	-21.97
WAEZ	LIC-D	235C	Greeneville	TN	240.36	1.2	248.5	-8.14

--- Channel 236 95.1 MHz. ---

WCHZ	LIC-Z	236C3	Harlem	GA	69.23	132.9	176.5	-107.27
AL237	VAC	237A	Due West	SC	52.42	36.9	105.5	-53.08
WNKS	LIC	236C	Charlotte	NC	217.51	41.6	248.5	-30.99
AL236	VAC	236A	Young Harris	GA	151.97	318.8	165.5	-13.53
WMGB	LIC-N	236C2	Montezuma	GA	176.19	211.7	189.5	-13.31
WLTM	LIC	235C1	Atlanta	GA	147.73	266.0	157.5	-9.77
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	54.5	-7.66

--- Channel 237 95.3 MHz. ---

AL237	VAC	237A	Due West	SC	52.42	36.9	165.5	-113.08
RADD	ADD	238C1	Doraville	GA	105.25	283.5	157.5	-52.25
WBTS	LIC	238C1	Athens	GA	105.25	283.5	157.5	-52.25
RDEL	DEL	238C1	Athens	GA	105.25	283.5	157.5	-52.25
WCHZ	LIC-Z	236C3	Harlem	GA	69.23	132.9	116.5	-47.27
WFMV	LIC-Z	237A	South Congaree	SC	141.00	90.1	165.5	-24.50
AL237	VAC	237A	Dillsboro	NC	154.90	346.3	165.5	-10.60
AL234	VAC	234A	Crawfordville	GA	46.84	203.1	54.5	-7.66

--- Channel 238 95.5 MHz. ---

RDEL	DEL	238C1	Athens	GA	105.25	283.5	223.5	-118.25
RADD	ADD	238C1	Doraville	GA	105.25	283.5	223.5	-118.25
WBTS	LIC	238C1	Athens	GA	105.25	283.5	223.5	-118.25
AL237	VAC	237A	Due West	SC	52.42	36.9	105.5	-53.08

--- Channel 239 95.7 MHz. ---

WBTS	LIC	238C1	Athens	GA	105.25	283.5	157.5	-52.25
RDEL	DEL	238C1	Athens	GA	105.25	283.5	157.5	-52.25
RADD	ADD	238C1	Doraville	GA	105.25	283.5	157.5	-52.25
WQZY.C	CP	240C0	Dublin	GA	137.76	172.5	175.5	-37.74
WQZY	LIC	240C0	Dublin	GA	137.76	172.5	175.5	-37.74
AL240	VAC	240A	Pendleton	SC	81.78	358.2	105.5	-23.72
WWBD.C	CP -Z	239C3	Bamberg	SC	168.37	112.9	176.5	-8.13
WXRC	LIC-D	239C0	Hickory	NC	230.73	41.4	238.5	-7.77
WWBD.A	APP-N	239C3	Bamberg	SC	169.88	108.5	176.5	-6.62
WWBD.A	APP-N	239C3	Bamberg	SC	169.88	108.5	176.5	-6.62
AL237	VAC	237A	Due West	SC	52.42	36.9	54.5	-2.08

--- Channel 240 95.9 MHz. ---

WQZY.C	CP	240C0	Dublin	GA	137.76	172.5	238.5	-100.74
WQZY	LIC	240C0	Dublin	GA	137.76	172.5	238.5	-100.74
AL240	VAC	240A	Pendleton	SC	81.78	358.2	165.5	-83.72
WKLS	LIC	241C0	Atlanta	GA	147.70	266.0	175.5	-27.80
AL237	VAC	237A	Due West	SC	52.42	36.9	54.5	-2.08

--- Channel 241 96.1 MHz. ---

WKLS	LIC	241C0	Atlanta	GA	147.70	266.0	238.5	-90.80
WKSP	LIC	242C2	Aiken	SC	80.15	108.0	129.5	-49.35
RADD	ADD	244A	Tignall	GA	6.49	287.8	54.5	-48.01
WQZY.C	CP	240C0	Dublin	GA	137.76	172.5	175.5	-37.74
WQZY	LIC	240C0	Dublin	GA	137.76	172.5	175.5	-37.74
WWMG	LIC-D	241C	Shelby	NC	217.51	41.6	248.5	-30.99
AL240	VAC	240A	Pendleton	SC	81.78	358.2	105.5	-23.72

--- Channel 242 96.3 MHz. ---

WKSP	LIC	242C2	Aiken	SC	80.15	108.0	189.5	-109.35
WGOG	LIC	242A	Walhalla	SC	109.06	345.0	165.5	-56.44
RADD	ADD	244A	Tignall	GA	6.49	287.8	54.5	-48.01
WKLS	LIC	241C0	Atlanta	GA	147.70	266.0	175.5	-27.80

--- Channel 243 96.5 MHz. ---

RADD	ADD	244A	Tignall	GA	6.49	287.8	105.5	-99.01
WKSP	LIC	242C2	Aiken	SC	80.15	108.0	129.5	-49.35
WYNF	LIC	243C3	Gray	GA	142.44	223.5	176.5	-34.06
WJCLFM	LIC	243C	Savannah	GA	244.02	147.0	248.5	-4.48

--- Channel 244 96.7 MHz. ---

RADD	ADD	244A	Tignall	GA	6.49	287.8	165.5	-159.01
WBZTFM	LIC-Z	244A	Mauldin	SC	116.62	15.7	165.5	-48.88
WAKB	LIC-N	245C3	Wrens	GA	84.02	149.2	116.5	-32.48
WLTY.C	CP -Z	244C3	Cayce	SC	149.25	84.3	176.5	-27.25
WNCCFM	LIC	244A	Franklin	NC	155.18	338.8	165.5	-10.32
WLTY	LIC	244A	Cayce	SC	158.79	85.9	165.5	-6.71
WNCCFM	APP-Z	244A	Franklin	NC	158.98	341.1	165.5	-6.52
WNCCFM	APP-Z	244A	Franklin	NC	159.15	341.1	165.5	-6.35

--- Channel 245 96.9 MHz. ---

RADD	ADD	244A	Tignall	GA	6.49	287.8	105.5	-99.01
WAKB	LIC-N	245C3	Wrens	GA	84.02	149.2	176.5	-92.48
WFOX	LIC	246C	Gainesville	GA	105.25	283.5	187.5	-82.25

--- Channel 246 97.1 MHz. ---

WFOX	LIC	246C	Gainesville	GA	105.25	283.5	248.5	-143.25
RADD	ADD	244A	Tignall	GA	6.49	287.8	54.5	-48.01
RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	57.5	-41.36
WAKB	LIC-N	245C3	Wrens	GA	84.02	149.2	116.5	-32.48

--- Channel 247 97.3 MHz. ---

WFOX	LIC	246C	Gainesville	GA	105.25	283.5	187.5	-82.25
RADD	ADD	244A	Tignall	GA	6.49	287.8	54.5	-48.01

--- Channel 248 97.5 MHz. ---

RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	129.5	-113.36
WCOSFM	LIC	248C1	Columbia	SC	158.43	80.2	223.5	-65.07
WMGZ	LIC	249C3	Eatonton	GA	76.84	215.3	116.5	-39.66
RDEL	DEL	249C3	Eatonton	GA	76.84	215.3	116.5	-39.66
WHZT.A	APP-Z	251C	Seneca	SC	75.89	343.8	104.5	-28.61
RDEL	DEL	251C	Seneca	SC	88.97	345.9	104.5	-15.53
WPZE	LIC	248C3	Fayetteville	GA	176.26	255.2	176.5	-0.24

--- Channel 249 97.7 MHz. ---

RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	189.5	-73.36
WMGZ	LIC	249C3	Eatonton	GA	76.84	215.3	176.5	-99.66
RDEL	DEL	249C3	Eatonton	GA	76.84	215.3	176.5	-99.66
WHZT.A	APP-Z	251C	Seneca	SC	75.89	343.8	104.5	-28.61
RDEL	DEL	251C	Seneca	SC	88.97	345.9	104.5	-15.53

--- Channel 250 97.9 MHz. ---

RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	129.5	-113.36
WHZT.A	APP-Z	251C	Seneca	SC	75.89	343.8	187.5	-111.61
RDEL	DEL	251C	Seneca	SC	88.97	345.9	187.5	-98.53
WHZT	LIC	251C0	Seneca	SC	88.97	345.9	175.5	-86.53
WHZT.A	APP-Z	251C1	Seneca	SC	88.83	8.5	157.5	-68.67
WMGZ	LIC	249C3	Eatonton	GA	76.84	215.3	116.5	-39.66
RDEL	DEL	249C3	Eatonton	GA	76.84	215.3	116.5	-39.66
WIIZ	LIC	250C2	Blackville	SC	154.28	124.6	189.5	-35.22
WPEG	LIC-D	250C	Concord	NC	217.51	41.6	248.5	-30.99
WIBBFM	LIC	250C3	Fort Valley	GA	175.82	212.5	176.5	-0.68

--- Channel 251 98.1 MHz. ---

WHZT.A	APP-Z	251C	Seneca	SC	75.89	343.8	248.5	-172.61
RDEL	DEL	251C	Seneca	SC	88.97	345.9	248.5	-159.53
WHZT	LIC	251C0	Seneca	SC	88.97	345.9	238.5	-149.53
WHZT.A	APP-Z	251C1	Seneca	SC	88.83	8.5	223.5	-134.67
RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	57.5	-41.36
AL251	RSV	251C3	East Dublin	GA	150.03	178.3	176.5	-26.47
WELT.C	CP	251C3	East Dublin	GA	151.28	176.4	176.5	-25.22
AL254	VAC	254A	Lincolnton	GA	34.34	138.9	54.5	-20.16
WELT	LIC	251A	Swainsboro	GA	151.26	166.1	165.5	-14.24
WSLT	LIC	252A	Clearwater	SC	94.78	121.0	105.5	-10.72

--- Channel 252 98.3 MHz. ---

WHZT.A	APP-Z	251C	Seneca	SC	75.89	343.8	187.5	-111.61
RDEL	DEL	251C	Seneca	SC	88.97	345.9	187.5	-98.53
WHZT	LIC	251C0	Seneca	SC	88.97	345.9	175.5	-86.53
WSLT	LIC	252A	Clearwater	SC	94.78	121.0	165.5	-70.72
WHZT.A	APP-Z	251C1	Seneca	SC	88.83	8.5	157.5	-68.67
RADD	ADD	249C2	Lincolnton	GA	16.14	165.9	57.5	-41.36
WSB-FM	LIC	253C0	Atlanta	GA	147.71	263.9	175.5	-27.79